

NOV 13 1984

For Six Month Period Ending _____

(Insert date)

Name of Registrant Prather Seeger Doolittle & Farmer Registration No. 1815

Business Address of Registrant 1101 Sixteenth Street, N.W.
Washington, D.C. 20036

I-REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: n/a

- | | | |
|-----------------------|------------------------------|-----------------------------|
| (1) Residence address | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

- | | | |
|--------------------------|------------------------------|--|
| (1) Name | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

2. Explain fully all changes, if any, indicated in item 1. n/a

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information: n/a

Name

Position

Date Connection
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?
 Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? n/a
 Yes ☐ No ☐

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information: n/a

Name of foreign principal

Date of Termination

9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information: (see attached)

Name and address of foreign principal Empresa de Transporte Aereo del Peru ("AeroPeru") *Date acquired*
Plaza San Martin No. 910-914, Apartado 1414
Lima, Peru January 1974*

10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period. Empresa de Transporte Aereo del Peru ("AeroPeru")
The Government of the Federal Republic of Nigeria
The Royal Bank of Canada

III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

The Government of the Federal Republic of Nigeria: General legal representation on economic and other matters arising under domestic and international law, including assessing trends in U.S. policies, identifying support for economic development in Nigeria, encouraging private investment and expansion of the markets for Nigerian exports.

The Royal Bank of Canada: General legal services; telephone and personal contacts with various officials from the Treasury Department on issues and concerns being raised in the area of U.S.-Canadian banking relations.

AeroPeru: In addition to exempted activities, representatives of registrant discussed with various government officials the principal's position with respect to a dispute over reciprocity of services between the U.S. and Peru.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
 Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

(see attachment)

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully. n/a

²The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV—FINANCIAL INFORMATION

14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
5/30/84	AeroPeru	legal fees and expenses	\$ 7,787.53
6/8/84	Royal Bank of Canada	legal fees and expenses	18,140.51
6/26/84	Royal Bank of Canada	legal fees and expenses	14,707.51
6/29/84	AeroPeru	legal fees and expenses	3,269.95
7/27/84	AeroPeru	legal fees and expenses	6,596.08
9/7/84	AeroPeru	legal fees and expenses	3,564.51
10/1/84	Royal Bank of Canada	legal fees and expenses	9,503.86

Total \$63,569.95

(b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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³A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS--MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
<u>AeroPeru:</u>			
Reporting period		Telephone & teletransmissions	\$ 429.83
		Messengers & courier services	478.05
		Duplicating	193.45
		Postage	22.13
		Intown travel & parking	22.75
		Business meals	77.50
		Subtotal	\$ 1,223.71
<u>Federal Republic of Nigeria:</u>			
Reporting period		Telephone & teletransmissions	\$ 1,324.80
		Duplicating	350.60
		Business meals	245.82
		Intown travel & parking	19.55
		Travel	4,227.65
		Messengers	137.00
		Printing & publications	5.50
		Transcripts	144.85
		Postage	1.31
		Subtotal	\$ 6,457.08
<u>The Royal Bank of Canada:</u>			
Reporting period		Telephone & teletransmissions	\$ 253.66
		Messengers	897.00
		Duplicating	200.80
		Postage	21.21
		Business meals & seminars	233.79
		Publications & printing	444.24
		Subtotal	\$ 2,050.70

Total \$9,731.49

15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information: n/a

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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(c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
7/6/84	\$ 100.00	Friends of Phil Sharp	Philip R. Sharp
8/15/84	250.00	Clinger for Congress	William F. Clinger, Jr.
9/16/84	20.00	Dollars for Democrats (DC)	none
9/27/84	250.00	Friends of Phil Sharp	Philip R. Sharp
10/7/84	100.00	Democrats Vote	Walter F. Mondale
10/19/84	100.00	Carol Schwartz for Council	Carol Schwartz [D.C. City Council]

V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☐ No ☒

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

⁵Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☐

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☐ Newspapers ☐ Libraries
☐ Legislators ☐ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups
☐ Other (specify) _____

21. What language was used in this political propaganda:

☐ English ☐ Other (specify) _____

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☐ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☐ No ☐

VI—EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐
 Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☒ No ☐

If yes, have you filed an amendment to these exhibits? Yes ☒ No ☐

If no, please attach the required amendment.

⁶The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

⁷The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? n/a Yes ☐ No ☐

If no, please attach the required amendment. n/a

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☐ No ☐ n/a

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration state. and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge.

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

(Type or print name under each signature)

Edwin H. Seeger

Edwin H. Seeger

Subscribed and sworn to before me at ALEXANDRIA, VA.

this 21ST day of DECEMBER, 19 84

John W. Zimmerman
(Signature of notary or other officer)

⁸The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

9. "Have you acquired any new foreign principal during this 6 month reporting period?" Yes.

Name and address of foreign principal:

Date acquired:

Empresa de Transporte Aereo del Peru ("AeroPeru") January 1974
Plaza San Martin No. 910-914, Apartado 1414
Lima, Peru

*AeroPeru first became registrant's client in January 1974, however registrant's activities for AeroPeru through the reporting period ended November 13, 1974 were exempted by Section 3(g) of the Foreign Agents Registration Act (FARA). Registrant's supplemental statement for the reporting period ended May 13, 1975 reflected this fact and Exhibits A and B covering AeroPeru were then furnished. Registrant continued to list AeroPeru as a foreign principal in items 10 of each supplemental statement filed until 1982, at which time it was noted that between the reporting period ended May 13, 1976 and that ended May 13, 1982 (six years), registrant had engaged in no activities for, nor rendered any services to AeroPeru which were not exempt under the FARA. Accordingly, in the supplemental statement covering the reporting period ended May 13, 1982, registrant indicated in item 8 that connection with AeroPeru as a foreign principal ended May 1, 1982.

On May 21, 1984 registrant engaged anew in activities for AeroPeru which are required to be reported under the FARA. Accordingly, registrant indicated the renewed engagement of activities covered under the FARA in the supplemental statement filed for the period ended 5/13/84, attaching thereto in duplicate Exhibits A and B.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below? Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Empresa de Transporte Aereo del Peru "AeroPeru"

On May 21, 1984, registrant communicated AeroPeru's position on the reciprocity dispute by telephone to Carolyn Coldren, a staff member at the Civil Aeronautics Board (673-5096), to Donald Litton, chief of the CAB's Negotiations Division (673-5204), and to Richard Howill in the office of the State Department's Assistant Secretary for Inter-American Affairs (632-9210).

The Government of the Federal Republic of Nigeria

On behalf of the Federal Republic of Nigeria registrant has corresponded, met and spoken with U.S. officials of the International Bank for Reconstruction and Development with regard to the conduct of negotiations with international financial agencies, commercial banks and the U.S. Department of the Treasury on the rescheduling of Nigerian public and private debt, and has assisted in arranging bilateral meetings between representatives of the U.S. and the Nigerian Governments, as follows:

U.S. Department of State --

Ambassador Tom Smith, U.S. Ambassador to Nigeria, re status of private investment projects in Nigeria (9/25);

Don Gelber, Deputy Chief of Mission, American Embassy, Lagos, re economic and political conditions in Nigeria (9/21);

Frank Wisner, Deputy Assistant Secretary of State for African Affairs, U. S. Department of State, re economic problems and current U.S. policy (6/11, 9/12, 10/19, 11/9);

Princeton Lyman, Deputy Assistant Secretary, Bureau of African Affairs, U.S. Department of State, re IMF-IBRD relations (9/12, 9/20, 10/23);

James K. Bishop, Deputy Assistant Secretary, Bureau of African Affairs, U.S. Department of State, re Niger relief (10/23);

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?
Yes.

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The Government of the Federal Republic of Nigeria (cont'd)

Judy Johnson, Nigerian Desk Officer, U.S. Department of State, re visits by various officials of the Nigerian Government and agricultural product sales and food program (5/23, 6/13, 6/19).

U.S. Department of the Treasury --

Charles Schotta, Deputy Assistant Secretary for Arabian Peninsula Affairs, U.S. Department of the Treasury re Treasury policy toward Nigeria (10/2).

International Bank for Reconstruction and Development --

James B. Burnham, U.S. Director, International Bank for Reconstruction and Development, re IBRD relations (10/16).

The Royal Bank of Canada

On behalf of Royal Bank, registrant has sought to keep in contact with U.S. officials involved in U.S./Canadian banking relations. On June 13, 1984, representatives of registrant conferred with Assistant Secretary for International Affairs, David Mulford, U.S. Department of the Treasury, regarding the Treasury Department's reaction to the demise of Canadian bank legislation. On July 13, 1984 representatives of principal and registrant met with: M. Danny Wall, Staff Director; John T. Collins, General Counsel; and Lamar Smith, Chief Economist, Senate Committee on Banking, Housing & Urban Affairs to discuss reciprocity legislation.

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D.C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes _____ or No X

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No X

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Edwin H. Seeger
Signature

12/21/84
Date

EDWIN H. SEEGER
PRATHER SEEGER DOOLITTLE & FARMER

Please type or print name of
signatory on the line above

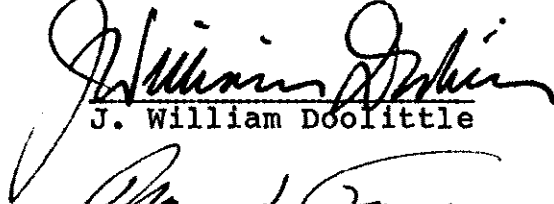
Partner
Title

Power of Attorney

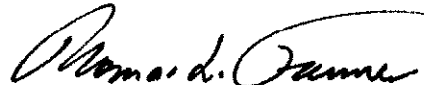
Know all men by these presents:

That we, Alfred V. J. Prather, J. William Doolittle, Thomas L. Farmer, Gary M. Welsh and Carl B. Nelson, in consideration of the confidence we have and repose in our partner Edwin H. Seeger, of Alexandria, Virginia, do hereby constitute and appoint Edwin H. Seeger our true and lawful agent and attorney-in-fact, for us and in our names, places and stead to represent us for the purpose of executing registration statements, supplemental statements and any amendments thereto filed with the Department of Justice pursuant to the Foreign Agents Registration Act of 1938, as amended.

Alfred V. J. Prather



J. William Doolittle



Thomas L. Farmer



Gary M. Welsh



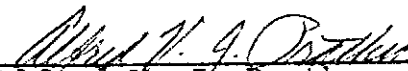
Carl B. Nelson

Dated 12/18/84

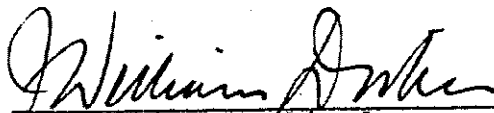
Power of Attorney


Know all men by these presents:


That we, Alfred V. J. Prather, Edwin H. Seeger, J. William Doolittle, Gary M. Welsh and Carl B. Nelson, Jr., in consideration of the confidence we have and repose in our partner, Thomas L. Farmer, of the District of Columbia, do hereby constitute and appoint Thomas L. Farmer our true and lawful agent and attorney-in-fact, for us and in our names, places and stead to represent us for the purpose of executing registration statements, supplemental statements and any amendments thereto filed with the Department of Justice pursuant to the Foreign Agents Registration Act of 1938, as amended.


Alfred V. J. Prather

Edwin H. Seeger


J. William Doolittle


Gary M. Welsh


Carl B. Nelson, Jr.

Dated 6/21/85